

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO. <u>03-007</u></b>
	:	
v.	:	<b>DATE FILED: _____</b>
	:	
<b>CHARLES CAMPA,</b>	:	<b>VIOLATIONS: 21 U.S.C. § 846</b>
<b>a/k/a “Carlos Campa”</b>	:	<b>(Conspiracy to distribute more than 5 kilograms</b>
<b>a/k/a “Freddy”</b>	:	<b>of cocaine - 1 count)</b>
<b>a/k/a “Charles Campanellie”</b>	:	<b>21 U.S.C. § 841(a)(1) - (Distribution of more than</b>
	:	<b>500 grams of cocaine - 1 count)</b>
	:	<b>21 U.S.C. § 843(b) (Unlawful use of a</b>
	:	<b>communication facility - 3 counts)</b>
	:	<b>18 U.S.C. § 2 (Aiding and abetting)</b>
	:	<b>21 U.S.C. § 853 (Criminal forfeiture)</b>

**SUPERSEDING INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. From in or about March 2002 through on or about December 8, 2002, in the Eastern District of Pennsylvania, and elsewhere, defendant

**CHARLES CAMPA,  
a/k/a “Carlos Campa”  
a/k/a “Freddy”  
a/k/a “Charles Campanellie,”**

conspired and agreed with others known and unknown to the grand jury, to knowingly and intentionally distribute in excess of 5 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii).

### **MANNER AND MEANS**

1. It was part of the conspiracy that defendant CHARLES CAMPA arranged for the distribution of kilogram quantities of cocaine from California to the Philadelphia area.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its object, the following overt acts, among others, were committed within the Eastern District of Pennsylvania, and elsewhere:

1. On or about November 15, 2002, defendant CHARLES CAMPA discussed by telephone with S.C., a person known to the grand jury, that defendant CHARLES CAMPA had shipped approximately one kilogram of cocaine to the Eastern District of Pennsylvania which was scheduled to arrive in the Eastern District of Pennsylvania the following day, that is, on or about November 16, 2002.

2. On or about November 16, 2002, defendant CHARLES CAMPA discussed by telephone with S.C., a person known to the grand jury, that the shipment of approximately one kilogram of cocaine to the Eastern District of Pennsylvania would arrive on or about November 18, 2002.

3. On or about November 18, 2002, the approximately one kilogram of cocaine shipped by defendant CHARLES CAMPA arrived in the Eastern District of Pennsylvania.

4. On or about November 18, 2002, defendant CHARLES CAMPA discussed by telephone with S.C., a person known to the grand jury, the shipment of approximately one kilogram of cocaine.

All in violation of Title 21, United States Code, Section 846.

### **COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 15, 2002, in the Eastern District of Pennsylvania,  
defendant

**CHARLES CAMPA,  
a/k/a “Carlos Campa”  
a/k/a “Freddy”  
a/k/a “Charles Campanellie,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute cocaine described in Count One, in violation of Title 21, United States Code, Section 846, in that defendant used a telephone to discuss that defendant had shipped approximately one kilogram of cocaine to the Eastern District of Pennsylvania which was scheduled to arrive in the Eastern District of Pennsylvania the following day, that is, on or about November 16, 2002.

In violation of Title 21, United States Code, Section 843(b).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 16, 2002, in the Eastern District of Pennsylvania,  
defendant

**CHARLES CAMPA,  
a/k/a “Carlos Campa”  
a/k/a “Freddy”  
a/k/a “Charles Campanellie,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute cocaine described in Count One, in violation of Title 21, United States Code, Section 846, in that defendant used a telephone to discuss that the shipment of approximately one kilogram of cocaine to the Eastern District of Pennsylvania would arrive on or about November 18, 2002.

In violation of Title 21, United States Code, Section 843(b).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 18, 2002, in the Eastern District of Pennsylvania,  
defendant

**CHARLES CAMPA,  
a/k/a “Carlos Campa”  
a/k/a “Freddy”  
a/k/a “Charles Campanellie,”**

knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the conspiracy to distribute cocaine described in Count One, in violation of Title 21, United States Code, Section 846, in that defendant used a telephone to discuss that the shipment of approximately one kilogram of cocaine had been received in the Eastern District of Pennsylvania.

In violation of Title 21, United States Code, Section 843(b).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about November 18, 2002, in the Eastern District of Pennsylvania,  
defendant

**CHARLES CAMPA,  
a/k/a “Carlos Campa,”  
a/k/a “Freddy,”  
a/k/a “Charles Campanellie”**

knowingly and intentionally distributed, and aided and abetted, and wilfully caused the distribution of, in excess of 500 grams, that is, approximately one kilogram, of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii), and Title 18, United States Code, Section 2.

## **NOTICE OF FORFEITURE**

1. As a result of the violations of Title 21, United States Code, Sections 841(a)(1), 843(b) and 846 set forth in Counts One through Five of this Indictment, the defendant

**CHARLES CAMPA,  
a/k/a “Carlos Campa”  
a/k/a “Freddy”  
a/k/a “Charles Campanellie,”**

shall forfeit to the United States of America:

(a) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations of Title 21, United States Code, as charged in this Indictment.

(b) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of the violations of Title 21, United States Code, as charged in this Indictment.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 21, United States Code, Section 853.

**A TRUE BILL:**

---

**FOREPERSON**

---

**PATRICK L. MEEHAN**  
**United States Attorney**